

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
<i>Plaintiff,</i>)	
vs.)	Case No. 2:22-cv-00025
)	
0.905 ACRES, MORE OR LESS,)	
SITUATED IN ADAIR COUNTY, STATE)	
OF MISSOURI, AND CHAD D. SAMPSON)	
AND MACKENZIE D. SAMPSON,)	
HUSBAND AND WIFE, et al.,)	
)	
1.205 ACRES, MORE OR LESS,)	
SITUATED IN ADAIR COUNTY, STATE)	
OF MISSOURI, AND VERA FAUROT)	
BURK TRUST OF JUNE 13, 1988, AS)	
AMENDED ON JUNE 21, 2002, C/O)	
MARY BURK LAIRD, SUCCESSOR)	
TRUSTEE, et al.,)	
)	
<i>Defendants.</i>)	

COMPLAINT IN CONDEMNATION [With Declaration of Taking]

1. This is a civil action brought by the United States of America at the request of the Administrator of the Federal Aviation Administration (“FAA”) through the Deputy Administrator for Acquisition and Business Services for the taking of land and certain interests in real property in Adair County, Missouri, under the power of eminent domain through a Declaration of Taking, and for the determination and award of just compensation to the owners and parties in interest.

2. The Court has jurisdiction over all relevant matters in the case as provided by 28 U.S.C. § 1358. The Court has venue under 28 U.S.C. § 1403.

3. The authority for the acquisition of the estate in property is set forth in Schedule A, filed contemporaneously herewith and made a part hereof. As stated in Schedule A, the interest in the property is taken pursuant to the authority of 40 U.S.C. § 3113 and 40 U.S.C. § 3114, which authorize the condemnation of land and the filing of a Declaration of Taking; 49 U.S.C. §

106(f)(2)(A)(ii), 49 U.S.C. § 106(n)(l)(A)(i), (iii), and 49 U.S.C. § 40110(a)(l), which authorize the Administrator of the FAA to acquire property and equipment for airports and air traffic safety; memorandum entitled “Designation of Acquisition Executive and Delegation of Authority,” dated March 24, 2020, designating the Deputy Administrator, Acquisition and Business Services to be the FAA Acquisition Executive; and the Further Consolidated Appropriations Act, 2020, Public Law 116-94 (Division H, Title I, Facilities and Equipment - airport and airway trust fund) which made funds available for this acquisition.

4. The public purpose for which the land is taken is for the operation of the National Airspace System (NAS) to support the safe navigation and operation of all military, commercial and private instrument aviation activities in northern and eastern Iowa.

5. A legal description of the property being taken is set forth in Schedule C, filed contemporaneously herewith and made a part hereof.

6. A plat showing the land and the interest being taken is set forth in Schedule D, filed contemporaneously herewith and made a part hereof.

7. The estates taken in the property are described in Schedule E, filed contemporaneously herewith and made a part hereof.

8. The estimate of just compensation is stated in Schedule F, filed contemporaneously herewith and made a part hereof.

9. The names and addresses of known parties having or claiming an interest in said property are set forth in Schedule G, filed contemporaneously herewith and made a part hereof.

WHEREFORE, the United States requests judgment that the property and interests be condemned, and that just compensation for the taking be ascertained and awarded, and for such other relief as may be lawful and proper.

Respectfully submitted,

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